

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION**

Cody Prudente, as Personal Representative )  
of the Estate of John Prudente, Jr., )  
deceased, )

Civil No.: 1:22-CV-00024

Sandra Prudente, and )

John Prudente, Sr., )

Plaintiffs, )

vs. )

Mary Hamilton, individually and in her )  
official capacity as a City of Mandan Police )  
Officer, )

Joshua Scherr, individually and in his )  
official capacity as a City of Mandan )  
Police Officer, )

Dominic Hanson, individually and in his )  
official capacity as a City of Mandan Police )  
Officer, )

Peter Czapiewski, individually and in his )  
official capacity as a Lieutenant of City of )  
Mandan Police, )

David Raugust, individually and in his )  
official capacity as a Sergeant of City of )  
Mandan Police, and )

City of Mandan, )

Defendants. )

**MOTION FOR REQUEST TO  
ACCESS DOCUMENTS**

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[¶ 1] **COMES NOW**, the above-named Plaintiffs, Cody Prudente, as Personal Representative for the Estate of John Prudente, Jr., deceased, Sandra Prudente, and John Prudente, Sr., by and through their attorney of record, Amanda M. Corey and requests an Order from this Court

granting release of the Bureau of Criminal Investigations (BCI) complete and unredacted Report BCI20-0074 detailing the Death Investigation of John Prudente, Jr.

[¶ 2] On November 25, 2022, Ms. Corey executed service of a subpoena via Certified Mailing upon Lonnie Grabowski, Director of the North Dakota BCI regarding BCI Report BCI20-0074.

[¶ 3] Since that time, our office has been in communication with the BCI office in Bismarck as they prepared the file. We have been informed that without court order they cannot release the file without redactions as it contains sensitive information such as autopsy photographs, social security numbers, etc.

[¶ 4] Their offices have indicated that they will not oppose a Motion Requesting Access.

[¶ 5] Ms. Corey is the counsel of record for the above-named Plaintiffs, namely John Prudente, Jr., of whom the BCI's investigation file is centered around, and can find no reason as to deny her access to the entirety of the information held within.

[¶ 6] Therefore, the Plaintiffs respectfully request an Order from the Court Allowing Ms. Corey access to the complete and unredacted file.

Dated this 21<sup>st</sup> day of March, 2023.

**REICHERT LAW OFFICE**



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